

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re Flint Water Cases,)
)
) Case No.: 16-cv-10444-JEL-MKM
)
) (consolidated with 16-cv-11247)
)
) Hon. Judith E. Levy
)

Washington, et al.,)
Plaintiffs,)
)
v.)
)
City of Flint, et al.,)
Defendants,)

DECLARATION OF ATTORNEY STEPHEN F. MONROE

Pursuant to 28 U.S.C. § 1746, I, Stephen F. Monroe, declare as follows:

REGARDING EXHIBITS

1. I am one of the attorneys for the Individual *Washington* plaintiffs.
2. I have personal knowledge of the matters stated in this Declaration.
3. Exhibit 1 is a true and correct copy of the affidavit of Sharon Ball.
4. Exhibit 2 is a true and correct copy of the affidavit of Tina Ball.
5. Exhibit 3 is a true and correct copy of the email from ARCHER Systems to Valdemar Washington.
6. Exhibit 4 is a true and correct copy of the news article accessed from MLive.com titled, *Flint Pediatrician Who Blew the Whistle on Water Crisis Won't Recommend Bone Scans for Kids*, published March 15, 2021.
7. Exhibit 5 is a true and correct copy of the Radiation Machine Registration Certificate dated February 24, 2021.

8. Exhibit 6 is a true and correct copy of *Pediatric Exposures to Ionizing Radiation: Carcinogenic Considerations*, Kutanzi, K, et al., Int. J. Environ. Res. Public Health 2016 Nov. 13(11): 1057.
9. Exhibit 7 is a true and correct copy of the document provided by Doctors Andrew Todd and Karl Jepsen.
10. Exhibit 8 is a true and correct copy of the email sent from Napoli Shkolnik on February 25, 2021.

REGARDING CONFERENCE WITH DOCTORS

11. On March 18, 2021, I was part of a remote video conference by Zoom with Drs. Andrew C. Todd, Ph.D., of Icahn School of Medicine at Mt. Sinai Hospital in New York, and Karl Jepsen, Ph.D., of the University of Michigan.
12. During that conference, a list of steps was shared by the doctors. A copy of that list is attached as Exhibit 7 to *Memorandum In Support of Washington And Chapman Plaintiffs' Motion To Extend Deadline For Opt-Outs, Registration And Objections By Sixty Days From March 18, 2021*.
13. They stated that they did not complete Step 1 because they did not receive Dr. Aaron Specht's protocol regarding how the device being used was customized.
14. The doctors stated that this information was important, in part, because it was necessary to achieve consistency between the devices used at the different sites.
15. The doctors stated that they were unable to obtain a device from the manufacturer for the purpose of conducting bone scans on people for this partial settlement.

I declare, under penalty of perjury, that the foregoing is true and correct.

/s Stephen F. Monroe

Stephen F. Monroe

Executed on March 24, 2021
Flint, Michigan